

**United States Department of the Interior  
U.S. Fish and Wildlife Service  
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AESO/FA  
22410-2006-FA-001

November 3, 2005

Ms. Katherine Trott  
National Advisory Team for Wetland Delineation  
Regulatory Branch  
U.S. Army Corps of Engineers  
441 G Street, N.W.  
Washington, DC 20314-1000

Dear Ms. Trott:

The Arizona Ecological Services Field Office of the U.S. Fish and Wildlife Service has received Public Notice 200501975-BAH, with comment period ending December 5, 2005, announcing the availability of the Draft Arid West Regional Supplement to the Corps of Engineers Wetland Delineation Manual, August, 2005. We thank you for the opportunity to review the Draft Supplement and offer the following comments for your consideration.

We agree with you that wetland delineation procedures are in need of improved accuracy and efficiency, particularly in the arid southwestern United States. The draft supplement contains a lot of technical information and methods to be used in the field during wetland delineation efforts. Though much of this information is grounded in sound science and multi-agency collaboration, we believe the methods described in the manual should be ground-tested prior to adoption. Our primary concern is whether or not the manual will delineate riparian ecosystems as jurisdictional wetlands.

The lack of section 404 jurisdiction over riparian ecosystems has been a persistent issue in the southwestern United States. In 1993 our field office prepared a Riparian Issue Paper (enclosed) that addressed the need to regulate riparian ecosystems as jurisdictional wetlands. While the statistics and contacts in that paper are outdated, the underlying ecological and biological concepts supporting the need to regulate riparian ecosystems as jurisdictional wetlands are still applicable.

We recommend that the Draft Supplement be ground-tested in Arizona, and modified if necessary, to ensure that it captures cottonwood-willow gallery forests, mesquite bosques, and other ecosystems that provide ecological wetland functions. Those methods should then be formalized into Corps regulations regarding the delineation of wetlands and supercede the 1987 Manual for application in Arizona.

We again thank you for the opportunity to review the subject Public Notice. The enclosure is posted on our webpage at <http://www.fws.gov/arizonaes/>. If you have any questions regarding this matter, please contact Mike Martinez (x224).

Sincerely

/s/ Steven L. Spangle  
Field Supervisor

Enclosure

cc (w/o enclosure):

District Engineer, Los Angeles District, Army Corps of Engineers, Los Angeles, CA  
Chief, Regulatory Branch, Army Corps of Engineers, Phoenix, AZ  
Regional Administrator, Environmental Protection Agency, San Francisco, CA  
Supervisor, Project Evaluation Program, Arizona Game and Fish, Phoenix, AZ

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